

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

LYNNE FREEMAN,

Plaintiff,

v.

TRACY DEEBS-ELKENANEY P/K/A
TRACY WOLFF, et al.,

Defendants.

Case No.: 1:22-cv-02435-LLS-SN

DECLARATION OF BENJAMIN S. HALPERIN

Benjamin S. Halperin declares as follows:

1. I am Counsel with Cowan, DeBaets, Abrahams, & Sheppard LLP, attorneys for defendants Tracy Deebs-Elkenaney p/k/a Tracy Wolff, Entangled Publishing, LLC, Holtzbrinck Publishers, LLC d/b/a MacMillan, and Universal City Studios LLC (collectively, the “Entangled Defendants”), in the above-captioned matter. I make this declaration in support of the Entangled Defendants’ and defendants Emily Sylvan Kim’s and Prospect Agency, LLC’s letter motion filed May 1, 2023.

2. Attached hereto as Exhibit A is a true and correct copy of the complaint (the “CA Complaint”) filed by Plaintiff Lynne Freeman in the case captioned *Freeman v. Amazon.com Inc. et. al.*, No. 2:23-cv-02917 (C.D. Cal. filed Apr. 18, 2012) (the “California Action”).

3. Attached hereto as Exhibit B is a true and correct copy of Exhibit 1 to the CA Complaint.

4. Attached hereto as Exhibit C is a true and correct copy of Exhibit 2 to the CA Complaint.

5. Attached hereto as Exhibit D is a true and correct copy of Exhibit 3 to the CA Complaint.

6. Attached hereto as Exhibit E is a true and correct copy of the Notice of Related Case filed in the California Action.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: New York, New York
May 1, 2023


Benjamin S. Halperin